

**ExxonMobil Pipeline Company**

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**Mark D. Weesner**

Safety, Health And Environment Department  
Manager



October 3, 2013

Mr. Rodrick M. Seeley  
PHMSA Southwest Region, Director  
8701 S. Gessner Road, Suite 1110  
Houston, TX 77074

Re: CPF No. 4-2013-5006H –Corrective Action Order Item #4 "Work Plan"

Dear Mr. Seeley:

Pursuant to Corrective Action Order ("CAO") Item #12 (*Extensions of Time*), ExxonMobil Pipeline Company (EMPCo) hereby requests a ninety-day time extension for completion of CAO Item #4 (Remedial Work Plan). CAO Item #4 Remedial Work Plan, provides:

4. *Within 90 days after completing the metallurgical testing and analysis, submit a remedial work plan ("Work Plan") to the Director for approval. The Work Plan must provide for the verification of the integrity of the Affected Pipeline and must address all factors known or suspected in the Failure, including but not limited to the following:*
  - A. *The integration of the results of the failure analyses and other actions required by this Order with all relevant operating data including all historical repair information, results of past in-line inspections, construction, operating, maintenance, testing, metallurgical analysis or other third party consultation information, and assessment data for the Affected Pipeline;*
  - B. *The performance of additional field testing, inspections, and evaluations to determine whether and to what extent the conditions associated with the Failure or any other integrity-threatening conditions are present elsewhere on the Affected Pipeline. The results of the inspections, field excavations, and evaluations must be made available to PHMSA or its representative;*
  - C. *The performance of repairs or other corrective measures that fully remediate the identified risk conditions associated with the Failure and any other integrity threatening condition everywhere along the Affected Pipeline. Based on the known history and condition of the pipeline, the plans for repairs must include continuing long-term periodic testing and integrity verification measures to ensure the ongoing safe operation of the pipeline considering the results of the analyses, inspections, and corrective measures undertaken pursuant to the Order;*
  - D. *A proposed schedule for completion of items A-C.*

As PHMSA is aware, the Pegasus Pipeline remains shut down, and EMPCo continues to conduct testing and analysis on the failed section of pipe pursuant to CAO Item #4. The extended time we are seeking will allow for the additional testing, analysis and integration of results, and development of a more effective Work Plan.

EMPCo hereby requests that the deadline associated with CAO Item #4 be extended by ninety days, to Monday, January 6, 2014, to allow EMPCo time to develop and submit a Work Plan for PHMSA approval. Please let us know as soon as practicable whether PHMSA objects to this request for additional time to complete CAO Item #4.

Sincerely,

A handwritten signature in black ink, appearing to be "M. De" followed by a long horizontal line.